

**Federal Defenders
OF NEW YORK, INC.**

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August 6, 2018

VIA ECF
The Honorable J. Paul Oetken
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Russ Gerson, 17 CR 708 (JPO)*

Dear Judge Oetken:

With the consent of the government, I write to request that the conditions of Mr. Gerson's release be modified. Specifically, we ask that the Court remove the requirement that Mr. Gerson's personal recognizance bond be secured by \$20,000 cash. That cash was posted by Mr. Gerson's parents and we ask that the money be returned to them since it is not necessary to ensure Mr. Gerson's return to court or the safety of the public. A financial component to Mr. Gerson's bail package is more restrictive than necessary. Mr. Gerson, who has no prior criminal record, is charged in a single count indictment with a \$40,000 wire fraud. He has been out on bond since October 2017. He has a perfect compliance record during his pretrial release. He frequently travels abroad without incident. The government and pretrial services consent to this application.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/Julia Gatto
Julia L. Gatto
Assistant Federal Defender
(212) 417-8750

cc: AUSA Mary Bracewell (via ECF)
USPO Lea Harmon (via email)